

EXHIBIT B

Liviu Vogel - Further disclosure from Clearstream

From: Liviu Vogel
To: Frank Panopoulos
Date: 7/21/2008 7:27:06 PM
Subject: Further disclosure from Clearstream

Dear Frank:

I would like to obtain further discovery from Clearstream. Given Clearstream's position that it can only provide discovery in open court under court order, I would like to schedule a date for such testimony with you on consent. I can then submit the proposed date to the court for an order. Attached is a draft description of documents that we seek to be produced in addition to testimony. Please contact me to discuss.

Sincerely,

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SUBPOENA DUCES TECUM

1. The general terms and conditions and their amendments that governed account number [REDACTED]
2. The general terms and conditions and their amendments that governed account number [REDACTED].
3. The general terms and conditions and their amendments that governed account number [REDACTED].
4. Documents concerning instructions from [REDACTED] regarding the custodial nature of account no. [REDACTED] and the proprietary nature of account no. [REDACTED].
5. Documents concerning Clearstream's rating system applied to its customers and criteria used in rating customers.
6. Credit agreements between Clearstream and [REDACTED] whose implementation involved settlement of transactions in money or securities held in the United States of America for the account of [REDACTED], whether custodial or proprietary.
7. Documents concerning transaction instructions from [REDACTED] regarding securities or money held in the United States of America for the account of [REDACTED], whether custodial or proprietary.

8. Documents concerning credit limits and terms extended by Clearstream to [REDACTED] concerning its account numbers [REDACTED] and [REDACTED].

9. All documents concerning communications between [REDACTED] and [REDACTED] regarding transfers of money or securities from its account number [REDACTED] to [REDACTED] account number [REDACTED] or [REDACTED]

10. All documents concerning communications between [REDACTED] and Clearstream regarding transfers of money or securities from [REDACTED] account number [REDACTED] to [REDACTED] account number [REDACTED] or [REDACTED] and between [REDACTED] account numbers [REDACTED] and [REDACTED]

11. Reports made by Clearstream to any taxing authority concerning the securities transactions and redemptions reflected in documents marked as Exhibits H, I, K and L in the document binder produced by Clearstream during the testimony of Mark Gem in this action in court on June 27, 2008 ("Clearstream Exhibits").

12. Documents concerning Clearstream's instructions to its customers concerning use of its Creation Online System or other methods of communicating transaction instructions to Clearstream.

13. Documents concerning transactions pursuant to which [REDACTED] came to hold the positions in its account number [REDACTED] reflected in Clearstream Exhibits J and L prior to the transfer out of its account reflected in Clearstream Exhibit L.

14. Documents concerning communications concerning the proceedings initiated by Judgment Creditors for the execution, or in aid of execution of (including the restraint of accounts), the money judgment rendered in this action against Judgment Debtors, among or between any persons including, but not limited to, Clearstream,

Citibank, [REDACTED], or any of their employees, officers, directors, agents or attorneys.

15. Documents concerning information of the type provided in Clearstream Exhibits H and I for all transactions affecting [REDACTED] account number [REDACTED] involving securities custodized in the United States of America excluding the transactions described in demand number 13 above and excluding the transactions reflected in the Clearstream Exhibits.

16. Documents concerning the beneficial owner of interest in any security or money restrained by Clearstream or Citibank that is attributable to [REDACTED] account numbers [REDACTED] or [REDACTED] or any communications concerning the identity of such beneficial owner.

17. Documents describing any property other than the property reflected in Clearstream Exhibit D, in which Judgment Debtors have a beneficial interest, which is in the custody or control of Clearstream, including the location of such property, account information, a detailed description of the property, and the fair market or nominal value of the property.

18. Documents showing graphs for [REDACTED] account number [REDACTED] for the period January 1, 2007 to the present showing monthly cash balance, monthly number of transactions, monthly custody balance and monthly turnover analysis (similar to graphs appearing at page [REDACTED] in Clearstream Exhibit E).

19. Documents forming the basis of the inference testified to by Mr. Gem on June 27, 2008 that [REDACTED] paid consideration for the purchase of securities transferred

from account number [REDACTED] to account number [REDACTED] (see transcript of Gem testimony at pages 47 and 49).

20. Documents concerning procedures used by Clearstream or its customers to ensure that payment outside the Clearstream system is made to Clearstream's customer in exchange for delivery of securities within the Clearstream system free of payment.